

EXHIBIT 1

From: [Mitch Pomerance](#)
To: Info@hudsonvalleyhemp.com
Cc: [Jon Norinsberg](#); [Bennitta Joseph](#)
Subject: Robles v. HG Putnam Inc.
Date: Friday, November 15, 2024 09:21:00 AM 1.
Attachments: [Complaint-HG Putnam.pdf](#)
[1-1. Notice to attorney general.pdf](#)
[1-3. Sort site.pdf](#)
[7. Summons returned Executed \(AOS\).pdf](#)
[8. ORDER J. M. Furman, USDJ Status.pdf](#)

Ms. Danielle Canora,

I hope this message finds you well. My name is Mitchell Pomerance, and I am the ADA Compliance Chief at Joseph & Norinsberg, LLC. It is my duty to inform you of a currently pending action in the United States District Court for the Southern District of New York involving your company, HG Putnam, Inc. d/b/a Hudson Valley Hemp. This action, was filed on October 4, 2024, and which alleges that our client, Primitivo Roble, attempted to access the website www.hudsonvalleyhemp.com but was unable to do so, in violation of the Americans with Disabilities Act (ADA). Our records indicate that your company was notified of this pending action on October 24, 2024. However, to date, we have not received a response.

For your convenience, I have attached the following documents:

- The original complaint filed
- The notice sent to your company
- An audit conducted prior to the lawsuit being filed
- The executed summons
- The latest order from Magistrate Judge Furman, who instructed us to serve you with the complaint and the order

I must inform you that, according to federal civil law and rules, your company is currently in default as of yesterday, November 14, 2024, for failing to respond to the complaint in a timely manner. As a result, we are entitled to file for a default judgment. A default judgment means that, because your company did not respond to the complaint, we can request the court to grant us all the relief sought in the original complaint. This relief may include taking the website offline or remediating it immediately, in addition to paying our attorney fees and costs.

To avoid this outcome, I strongly advise you to either contact me directly or retain counsel to do so as soon as possible. Failing to address this matter promptly could result in a default judgment, imposing significant legal and financial obligations on your company without further recourse.

Please feel free to reach out to me or have a representative contact me at your earliest convenience.

Thank you for your attention to this urgent matter.

Regards,

Mitchell Pomerance
ADA Compliance Chief Joseph
& Norinsberg, LLC
110 East 59th Street, Suite
2300 New York, N.Y.
10022
mitch@employeejustice.com
(347) 439-5442

From: [Mitch Pomerance](#)
To: Info@hudsonvalleyhemp.com
Cc: [Jon Norinsberg](#); [Bennitta Joseph](#)
Subject: Robles v. HG Putnam Inc.
Date: Tuesday, November 26, 2024 10:23:00 AM
Attachments: [1. Complaint-HG Putnam.pdf](#)
[1-1. Notice to attorney general.pdf](#)
[1-3. Sort site.pdf](#)
[7. Summons returned Executed \(AOS\).pdf](#)
[8. ORDER J. M. Furman, USDJ Status.pdf](#)

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To avoid this outcome, I strongly advise you to either contact me directly or retain counsel to do so as soon as possible. Failing to address this matter promptly could result in a default judgment, imposing significant legal and financial obligations on your company without further recourse.

Please feel free to reach out to me or have a representative contact me at your earliest convenience. The court has given us until December 6, 2024, to inform them of our intentions.

Thank you for your attention to this urgent matter.

Mitchell Pomerance
ADA Compliance Chief
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